

# EXHIBIT 10

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE  
VIRGIN ISLANDS,

Plaintiff,

v.

No. 22-cv-10904-JSR

JP MORGAN CHASE BANK, N.A.,

Defendant.

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JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,  
Third-Party Defendant.

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THE ORAL DEPOSITION OF JOHN P. DE JONGH, JR.  
was taken on the 30th day of May, 2023 at the Law  
Offices of JOEL HOLT, 2132 Company Street,  
Christiansted, St. Croix U.S. Virgin Islands, between  
the hours of 9:02 a.m. and 4:46 p.m. pursuant to Notice  
and Federal Rules of Civil Procedure.

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Reported by:

DESIREE D. HILL  
Registered Merit Reporter  
Hill's Reporting Services  
P.O. Box 307501  
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1 Q. And do you have children?

2 A. We do.

3 Q. What are their names?

4 A. John Percy de Jongh, III, that's my  
5 oldest; Renee Adele de Jongh, that's my daughter,  
6 she's the second; and my youngest is Julien Louis  
7 de Jongh.

8 Q. What are their ages?

9 A. 33, 30 -- 31 and 26.

10 Q. Where did they attend high school?

11 A. They attended Antilles School.

12 Q. Same for primary school?

13 A. Yes.

14 Q. And where did they each attend college?

15 A. JP, John de Jongh, III, attended American  
16 University; Renee Adele attended Skidmore; and Julian  
17 Louis attended, initially, Providence College, and  
18 then he transferred to Temple.

19 Q. Do you know who Jeffrey Epstein is?

20 A. I do.

21 Q. What do you know about him?

22 MR. TEAGUE: Objection, vague.

23 You can answer.

24 MS. BOGGS: Join. And for

25 clarity, the government will join all of

1 the counsel for Governor de Jongh's  
2 objections.

3 THE WITNESS: He was my wife's  
4 employer for a number of years,  
5 financial affairs is what I understood  
6 of him. I've learned a lot more in the  
7 last couple of years.

8 Q. (By Mr. O'Laughlin:) What have you learned  
9 in the last couple of years?

10 A. Just more about things that he's accused  
11 of doing.

12 Q. What things are those?

13 A. Trafficking. Sex trafficking.

14 Q. How did you learn about the sex  
15 trafficking?

16 A. In the newspaper.

17 Q. When did you learn those facts?

18 A. 2018, 2019, with any great detail.

19 Q. What do you mean by "with any great  
20 detail?"

21 A. I never paid attention much before.

22 Q. But are you aware that there was public  
23 reporting prior to 2018?

24 A. Yes.

25 Q. And did you read that public reporting?

1 your attention?

2 A. No.

3 Q. So at no point between 2010 and now have  
4 these sorts of facts come to your attention?

5 MS. BOGGS: Objection, form.

6 MR. TEAGUE: Same objection.

7 THE WITNESS: Well, let me -- I  
8 thought you were asking me if this came  
9 to my attention in 2010.

10 Q. (By Mr. O'Laughlin:) No. I meant has that  
11 ever come to your attention.

12 A. Any of these facts, specifically?

13 Q. Yeah.

14 A. Just from public records after 2000 --  
15 after 2015, yeah.

16 Q. So --

17 A. I thought you were asking me was I aware  
18 of this blog, the Daily Beast --

19 Q. Okay. So let's -- let me clarify.

20 A. -- when I was governor.

21 Q. So in 2010 when this article was published,  
22 none of this came to your attention, correct?

23 A. I was not aware of this article in 2010.

24 Q. But at some point between 2010 and today,  
25 you have become aware of these sorts of allegations,

1 correct?

2 MS. BOGGS: Objection.

3 Objection, form. Mischaracterizes  
4 testimony.

5 MR. TEAGUE: Objection, form. You  
6 can answer.

7 THE WITNESS: Not the number of  
8 pages in an indictment or the  
9 specificity of 12-year-old girls, no.  
10 Just as general acts.

11 Q. (By Mr. O'Laughlin:) What do you mean by  
12 "general acts"?

13 A. That the allegations that he brought girls  
14 abroad, that some may have come to the V.I. That's  
15 it.

16 Q. And when did those sorts of facts come to  
17 your attention?

18 A. Periodically. I mean, I can't give you  
19 the exact date.

20 Q. But you would have been following the news,  
21 generally?

22 A. No.

23 MS. BOGGS: Objection, form.  
24 Mischaracterizes testimony.

25 THE WITNESS: No, I would not be

1 recall those type of conversations.

2 Q. (By Mr. O'Laughlin:) Prior to 2018, you  
3 don't recall those types of conversations?

4 A. No.

5 Q. But after 2018, you do recall those type of  
6 conversations?

7 A. As more information became public, yes.

8 Q. What were the conversations following 2018?

9 A. Just that she was concerned about what he  
10 did.

11 Q. What was her concern?

12 A. The impact on the young ladies. And the  
13 office, continued employment, what would happen to  
14 the employees.

15 Q. When did she raise those concerns with you?

16 MR. TEAGUE: Objection, form.

17 Asked and answered. You can answer  
18 again.

19 THE WITNESS: 2018, 2019.

20 Q. (By Mr. O'Laughlin:) Do you recall specific  
21 conversations?

22 A. No. No.

23 Q. It was just something you discussed  
24 generally with her?

25 A. Correct.

1 THE WITNESS: That I can't answer.

2 Q. (By Mr. O'Laughlin:) But they oversaw them?

3 A. Yes.

4 MS. BOGGS: Objection, form.

5 MR. TEAGUE: Objection, form.

6 Q. (By Mr. O'Laughlin:) Are you aware of  
7 allegations that Epstein was bringing women in and out  
8 through the USVI airport?

9 MS. BOGGS: Objection, form.

10 THE WITNESS: Are we talking in  
11 2014 during my term or are we talking  
12 2018 and '19?

13 Q. (By Mr. O'Laughlin:) Let's answer both.  
14 What about in 2014?

15 A. No.

16 Q. What about in 2018?

17 A. Yes.

18 Q. So in 2018, you were aware of allegations  
19 that Epstein was bringing women in and out through the  
20 V.I. airport?

21 MS. BOGGS: Objection, form.

22 MR. TEAGUE: Same objection.

23 THE WITNESS: When you say  
24 "airport," I am presuming you mean the  
25 building. Mr. Epstein had a private